



MEMO ENDORSED.

August 22, 2022

VIA ELECTRONIC CASE FILING (“ECF”)

The Honorable Ona T. Wang, USMJ
United States District Court
Southern District of New York
Daniel Patrick Moynihan
500 Pearl Street, Courtroom 20D
New York, New York 10007

Re: Shane Francis Uht v. Kilolo Kijakazi, Acting Commissioner of Social Security
Index No.: 1:22-cv-02143-JPC-OTW
Letter Motion Requesting Additional Time to File Plaintiff’s Motion

Dear Hon. Wang:

Manhattan Legal Services (“MLS”), through the undersigned, is representing Plaintiff, Shane Francis Uht (hereinafter referred to as “Mr. Uht” or “Plaintiff”) in the above-captioned matter. Please accept this correspondence in relation to Plaintiff’s Motion for Judgment on the Pleadings, which has a return date of sixty (60) days after the filing of the certified administrative record, or more specifically, on August 27, 2022, pursuant to the Scheduling Order.

We respectfully request an expansion of time to submit Plaintiff’s moving papers on the grounds that the undersigned, whom has been assigned as Mr. Uht’s advocate and counsel, has encountered an unforeseen circumstance and would need to be out of office for at least ten (10) days. Moreover, we note that, prior to motioning the Court for an expansion of time to appear and respond, the undersigned has obtained the mutual consent of Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (hereinafter referred to as “Commissioner” or “Defendant”), through her counsel, Mr. Vernon Norwood, at the Office of General Counsel for the Social Security Administration. Additionally, we note that to date, Plaintiff has filed no prior requests for adjournments.

Accordingly, we kindly and respectfully request Your Honor expand time for Plaintiff’s moving papers to be filed by thirty (30) days, or to a date that Your Honor deems fair and adequate to appropriately appear and respond in this matter.

Should Your Honor have any questions or concerns, please contact me either at (646)237-7769 or via electronic mail at gwilliams@lsnyc.org. Best wishes for continued good health during these uncertain times.

Thank You for Your Honor's consideration to this request.

Respectfully Submitted,

LEGAL SERVICES NYC



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Attorneys for Plaintiff

Plaintiff's request for an extension is rendered moot by the Court's Scheduling Order dated August 23, 2022. The parties are directed to refer to that Order for information on their moving dates and deadlines.

SO ORDERED.



Ona T. Wang 8/23/22
U.S.M.J.

Notice Sent to Defendant via ECF notification and addressed to: vernon.norwood@ssa.gov.